

AUG 26 2004

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:

Bart Kavanaugh

Application No.: 09/986,670

Filed: November 9, 2001

Title: System for Funding, Analyzing and
Managing Life Insurance Policies
Funded with Annuities

Confirmation No.: 5823

Group Art Unit: 3624

Examiner: Jagdish N. Patel

RESPONSE TO NON-FINAL OFFICE ACTIONMS Non-Fee Amendment
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

In response to the non-final Office Action dated July 12, 2004, please reconsider the above-identified U.S. patent application in view of the following amendments and remarks:

A full listing of claims begins on page 2 of this paper.

Remarks begin on page 7 of this paper.

1806317 v1; 12PRH01.DOC